

Whistleblower Policy

February 2024



Contents

1. Introduction	03
2. Scope	04
3. Definitions	05
4. Policy statements	06
5. What is Reportable Conduct?	07
6. Who do I make the Protected Disclosure to?	08
7. Investigating Protected Disclosures	09
8. Protection	10
9. Support	13
10. Escalation	14
11. Roles and responsibilities	15
12. Related legislation and documents	17
13. Approval and review	17
14. Document control	17
Annexure A	19

1. Introduction

- 1.1 This document is the Whistleblower Policy. This Policy forms part of our **Speak Up Program**.
- 1.2 The purpose of this Policy is to reflect our commitment to a strong risk culture and ethical behaviour. Our values; Honest, Human, Passionate, Recognition, Dynamic and Awesome Service, together with our risk and compliance frameworks, help influence how we behave, make decisions and interact with others, be that with our customers, our colleagues or our suppliers. The Policy builds on Youi's values and culture, its high standards of conduct and the ethical behaviour that is expected of all Youi Employees, Contractors and service providers..
- 1.3 It builds on Youi's values and culture, its high standards of conduct and the ethical behaviour that is expected of all Youi Employees.
- 1.4 At Youi, our Code of Conduct outlines the importance of speaking up and we are committed to fostering a culture where our people feel safe to speak up on matters that concern them. This Policy provides all current and former Youi:
 - Employees;
 - Contractors;
 - directors and officers;
 - suppliers; and
 - associates,and their relatives, dependents and spouses (Eligible Whistleblowers) with the opportunity to report any actual or suspected wrongdoing or serious misconduct.
- 1.5 This Policy sets out how Eligible Whistleblowers are protected when they report a concern under this Policy, and it is an important tool to help Youi identify serious misconduct that may not otherwise be uncovered in the absence of a safe and secure means for disclosing wrongdoing.
- 1.6 Youi does not tolerate any form of retaliation or victimisation as a result of an Eligible Whistleblower speaking up in accordance with this Policy.
- 1.7 The Whistleblower Policy applies with effect from the Effective date.
- 1.8 The Youi Code of Conduct contains guidance on the process of disclosing non-compliance with this Policy. The raising of breaches, or potential breaches, of a Youi policy forms an integral part of Youi's risk management framework.

2. Scope

- 2.1 This Policy applies to Youi Pty Ltd (Youi).
- 2.2 It applies to all Youi Employees, service providers and Contractors in all Youi locations.
- 2.3 It incorporates the OUTsurance group requirements, as far as applicable.
- 2.4 An Eligible Whistleblower who raises a concern under this Policy may qualify for special protections available under the Corporations Act or Tax Act (Protected Disclosure).
- 2.5 A Protected Disclosure will arise where all the following elements are present:
- the information relates to information classified as Reportable Conduct (see section 5 below); and
 - the Reportable Conduct is reported by an Eligible Whistleblower to:
 - the Australian Securities & Investments Commission (ASIC) or the Australian Prudential Regulation Authority (APRA) for a Protected Disclosure under the Corporations Act; or
 - the Commissioner of Taxation for Protected Disclosure under the Tax Act.
- 2.6 Eligible Whistleblowers are entitled to seek advice or representation from a legal practitioner who is external to Youi in relation to the operation of the whistleblowing provisions under the Corporation Act and/or Tax Act. In these circumstances, any communications with your legal practitioner will be confidential and will be protected. If, after speaking with your legal advisor, you elect to make a disclosure under this Policy, that disclosure will only qualify as a Protected Disclosure if it satisfies the criteria outlined in paragraph 2.5 above.
- 2.7 Generally, this Policy does not cover:
- risk and compliance issues an Eligible Whistleblower raises via their Manager or reported as a Risk Incident; or
 - grievances that relate to personal grievances, discrimination or harassment. Employees must raise these types of concerns in line with the Grievance Resolution Policy and Anti-Discrimination and Harassment Policy.
- 2.8 This Policy does not cover customer complaints. Customers must raise their concerns by contacting a Youi advisor, the Youi Internal Dispute Resolution Service team, the external ombudsman, or the Australian Financial Complaints Authority (AFCA). For further details, refer to www.youi.com.au/handling-your-complaint or call **13 YOUI (9684)**.

3. Definitions

3.1 Terms not defined below may be defined throughout this document.

3.2 “Youi” or “We”: Youi Pty Ltd (ABN 79 123 074 733), authorised to carry on insurance business in Australia.

“OUTsurance”: OUTsurance Holdings Ltd (Reg No. 1997/022260/06, South Africa), the parent company which holds the majority of the shares in the Company through OUTsurance International Holdings Pty Ltd (Reg No. 2007/004026/07, South Africa). OUTsurance Group Ltd (Reg No. 2010/005770/06, South Africa) (“OGL”) is the ultimate holding company.

Term	Definition
Contractors	Individuals who are not Employees, and corporations or organisations, engaged to perform services for Youi.
Corporations Act	Corporations Act 2001 (Cth)
Employee	Full- time, part- time and casual Employees of Youi.
Speak Up Program	A program to provide safe avenues and formal processes to enable Employees and third parties to raise issues without fear of reprisal. The Speak Up Program encompasses reports that are made under this Policy as well as reports that are in the nature of a personal grievance, discrimination or harassment and made under Youi’s Grievance Resolution Policy and Anti- Discrimination and Harassment Policy.
Tax Act	Taxation Administration Act 1953 (Cth)
Whistleblower	Includes someone who is (or has been): <ul style="list-style-type: none"> (a) an officer of Youi, such as a director or company secretary; (b) an Employee of Youi; (c) an individual (whether paid or unpaid) who supplies goods or services to Youi (or an employee of that supplier); or (d) a relative or dependent of an individual above (including but not limited to, a spouse, parent, child, grandchild or sibling).
Alternative Whistleblower Officer	Head of Internal Audit
Protected Disclosure	A disclosure of Reportable Conduct made by an Eligible Whistleblower to an Eligible Recipient that is being treated in accordance with this Policy.

4. Policy statements

- 4.1 We are committed to fostering a culture where our people feel safe to speak up on matters that concern them, and we will support you throughout the process of raising a concern through the Speak Up Program.
- 4.2 We will provide internal and external channels for you to be able to speak up and raise your concerns, including the option to raise concerns anonymously.
- 4.3 We investigate and record all concerns fairly, objectively, and confidentially.
- 4.4 We will not tolerate any form of retaliation or victimisation as a result of you speaking up in accordance with this Policy and we will support and protect you even if it turns out your concerns are not substantiated, so long as you had reasonable grounds to suspect the concerns you were raising and that your concerns were raised in good faith. A Whistleblower Officer will be made available to provide protections, as outlined in this Policy, for someone raising Reportable Conduct.
- 4.5 However, you must not knowingly make a report you know is not true or is misleading. Where it is found that you knowingly made a false report, this may be a breach of the Code of Conduct and will be considered a serious matter that may result in disciplinary action. There may also be legal consequences if you knowingly make a false report.
- 4.6 This Policy is published internally on our Intranet (YourWorld). It can be found via the Policies Register, Report an Incident page, or RLC Department homepage. The Policy is also published on our website and is accessible to potential disclosers within and outside of Youi.
- 4.7 Breach of the Policy:
- **Consequences:** Breach of this Policy may be regarded as misconduct, which may lead to disciplinary action (including termination of employment or engagement). An individual may also be exposed to criminal or civil liability for a breach of relevant legislation.
 - **Escalation:** Any alleged breach of this Policy will be taken seriously and, if appropriate, will be separately investigated. Potential or realised breaches of obligations outlined in this Policy must be escalated to the Policy Owner.

5. What is Reportable Conduct?

- 5.1 To qualify as a Protected Disclosure and receive protection under this Policy, you must have reasonable grounds to suspect that the information you are disclosing about Youi concerns:
- misconduct; or
 - an improper state of affairs or circumstances (**Reportable Conduct**)
- 5.2 The Reportable Conduct can be about Youi, or an officer or Employee of Youi, and must amount to serious misconduct comprising:
- a breach of the Corporations Act;
 - a breach of the Tax Act;
 - a breach of other financial sector laws enforced by ASIC or APRA;
 - a breach of an offence against any other law of the Commonwealth of Australia that is punishable by imprisonment for a period of 12 months or more; or
 - a danger to the public or the Australian financial system.
- 5.3 By way of example, Reportable Conduct includes conduct such as:
- fraud (e.g. misappropriation of trust funds or fraudulent fabrication of data provided to a customer);
 - offering or accepting a bribe (e.g. bribing a government official for access to sensitive data); or
 - illegal activity (e.g. theft, drug sale or use, violence, criminal damage to property or a failure to comply with, or breach of, legal or regulatory requirements).
- 5.4 As explained in section 2, disclosures that relate to personal work-related grievances (that do not also involve serious misconduct, like the examples outlined above) do not comprise Reportable Conduct and do not qualify for protection under this Policy.
- 5.5 Examples of personal work-related grievances might include:
- a conflict between two employees;
 - a decision to transfer or demote an employee;
 - a decision on an employee's terms and conditions of employment; or
 - a decision to suspend or terminate a contractor.

6. Who do I make the Protected Disclosure to?

6.1 To qualify as a Protected Disclosure and receive protection under this Policy, you must make your disclosure to an Eligible Recipient.

6.2 The Corporations Act sets out the following categories of Eligible Recipients in relation to Protected Disclosures under that Act:

- An officer, director, company secretary or senior manager (at Youi, this is defined as an Officer of the Company or Responsible Person);
- an auditor, or a member of an audit team (at Youi, this is defined as the Head of Internal Audit or the Audit Manager);
- an actuary (at Youi, this is defined as the Chief of Actuarial and Analytics or the Appointed Actuary); or
- a person authorised by Youi to receive Protected Disclosures.

6.3 In relation to Protected Disclosures made under the Tax Act, the same categories of Eligible Recipients apply. In addition, the Tax Act sets out the following additional categories of Eligible Recipients:

- a registered tax and BAS agent who provides tax agent or BAS services to Youi; or
- any employee or officer who has functions or duties that relate to Youi's tax affairs (at Youi, this is defined as the Chief Finance Officer).

6.4 While all Eligible Recipients can receive disclosures of Reportable Conduct, Youi would like to identify and address any wrongdoing as early as possible. Therefore, to ensure that your concern is handled in the most effective and efficient manner, Youi encourages you to raise your concern with the Whistleblower Officer or the Alternative Whistleblower Officer.

6.5 You can raise your concern with the Whistleblower Officer in a number of ways, including by:

- meeting in person;
- a telephone call; or
- the Speak Up Hotline.

6.6 If you do not consider that it is appropriate for you to raise your concern with the Whistleblower Officer (e.g. if there is a conflict of interest), you may report your concern to the Alternative Whistleblower Officer by:

- meeting in person;
- a telephone call; or
- the Speak Up Hotline.

6.7 **Annexure A** includes further details of the channels available to raise concerns.

6.8 All disclosures received under this Policy will be assessed by the Whistleblower Officer or the Alternative Whistleblower Officer to determine whether a disclosure comprises a Protected Disclosure and, accordingly, falls within the scope of this Policy.

Who Do I Make the Protected Disclosure To? (cont.)

- 6.9** If you raise your concern with one of the other Eligible Recipients, where it is appropriate to do so, they will ask that you raise your concern with the Whistleblower Officer or the Alternative Whistleblower Officer (remembering that your concern can be raised on an anonymous basis and using the Speak Up Hotline). This is because, in most cases and so long as there is no conflict of interest, it will be the Whistleblower Officer who will be responsible for considering the concern, determining whether it comprises a Protected Disclosure that qualifies for protection under the Corporations Act or the Tax Act and this Policy, and what steps should be taken to investigate it. In these circumstances, unless you provide the Eligible Recipient with consent to reveal your identity, they will keep your identity confidential.
- 6.10** When raising a concern, you may do so anonymously. While you are encouraged to share your identity, as it will make it easier for Youi to address your concern, you are not required to do so. If you do not share your identity, Youi will assess your concern in the same way as if you had revealed your identity. However, there may be some practical limitations in conducting the investigation if you do not share your identity.
- 6.11** If an anonymous report is made through the Speak Up Hotline, you will receive a unique reference number. You can then contact the Speak Up Hotline to provide further information or request an update at any time.

7. Investigating Protected Disclosures

- 7.1** The Whistleblower Officer or Alternative Whistleblower Officer will carry out a preliminary review of the concern raised and will decide whether it qualifies as a Protected Disclosure and whether it should be investigated. Not all concerns raised will necessarily lead to an investigation (for instance, a disclosure may already have been investigated previously) but all concerns will be assessed, and a decision made as to whether they should be investigated.
- 7.2** If the Whistleblower Officer or Alternative Whistleblower Officer decides that a Protected Disclosure will be investigated, the Whistleblower Officer or Alternative Whistleblower Officer will conduct or commission an investigation.
- 7.3** The Whistleblower Officer or Alternative Whistleblower Officer will advise you of the decision whether to investigate unless the Protected Disclosure has been made anonymously and they have no means to contact you.
- 7.4** Investigations will follow a fair process, be conducted in a timely manner as the circumstances allow and be independent of the person(s) about whom an allegation has been made.
- 7.5** The Whistleblower Officer or Alternative Whistleblower Officer will, as appropriate, provide you with feedback on the progress and expected timeframes of the investigation. Provided there are no restrictions or other reasonable bases for doing so, persons against whom a Protected Disclosure has been made will be informed of the concern and will have an opportunity to respond. At no time will this person be told the Whistleblower's identity.

Investigating Protected Disclosures (cont.)

- 7.6 The investigation may conclude with a report from the Whistleblower Officer or Alternative Whistleblower Officer or other external investigator. The report will include findings on the concerns raised in the Protected Disclosure and a summary of the evidence on which the findings are based. Subject to any applicable laws, Youi may, at its discretion, inform you and/or any person against whom concerns raised in the Protected Disclosure have been made by you of the findings. Any report will remain the property of Youi.
- 7.7 Where the investigation substantiates the Protected Disclosure, Youi will consider and determine any appropriate steps to take to address the misconduct, including by way of example, whether changes to processes, systems and/or training are required to reduce the likelihood of the Reportable Conduct happening again. Where a person is found to have engaged in misconduct, the matter will be dealt with in accordance with Youi's disciplinary procedures. This may include disciplinary action being taken, including dismissal. Any instances of serious criminal matters will be reported to the police or other appropriate regulatory authorities.

8. Protection

- 8.1 The following protections are available to Eligible Whistleblowers provided they have made a Protected Disclosure in accordance with this Policy.

Protection of your identity

- 8.2 There is no requirement for an Eligible Whistleblower to identify themselves to qualify for protection. If you choose to identify yourself but otherwise want your identity to remain confidential, your identity (or information that is likely to lead to your identity being known) will not be disclosed. This is subject to certain specific exceptions which are explained below.
- 8.3 The identity of a person that has made a Protected Disclosure (i.e. the Eligible Whistleblower) will remain confidential unless it is revealed:
- to ASIC or APRA (in relation to disclosures protected under the Corporations Act);
 - to the Commissioner of Taxation (in relation to disclosures under the Tax Act);
 - to a member of the Australian Federal Police;
 - to a legal practitioner for the purposes of obtaining legal advice or representation;
 - with the consent of the Eligible Whistleblower; or
 - as otherwise required by law.

Protection (cont.)

8.4 If an Eligible Whistleblower wishes to remain anonymous, Youi will take all reasonable steps to protect their confidentiality including, but not limited to, the following:

- where possible, the Eligible Whistleblower will be contacted to help identify certain aspects of the disclosure that could inadvertently identify them;
- all paper and electronic documents and other materials relating to disclosures under this Policy will be stored securely;
- access to all information relating to a disclosure under this Policy will be limited to those directly involved in managing and investigating the disclosure;
- where identity is provided, only a restricted number of people who are directly involved in handling and investigating a disclosure are made aware of the identity or information that is likely to lead to the identification of a Whistleblower;
- communications and documents relating to the investigation of a disclosure will not be sent to an email address or a printer in a manner that can be accessed by staff other than those directly involved in managing and investigate the disclosure.

Additionally, some of the measures we may adopt to reduce the risk that you will be identified from the information contained in a disclosure may include some or all of the following, as appropriate in the circumstances:

- using a pseudonym in place of your name;
- redacting your personal information or references to you witnessing an event;
- referring to you in a gender-neutral context; and
- ensuring all disclosures will be handled and investigated by qualified staff who have been trained in whistleblower protections, including the confidentiality requirement that an unauthorised disclosure of your identity may be a criminal offence.

8.5 Under no circumstances does this Policy allow for or condone the disclosure of the actual identity of an Eligible Whistleblower who has made a Protected Disclosure other than as set out above in section 8.3. However, for the purposes of an investigation, information that is likely to or may lead to the identification of the Eligible Whistleblower (but is not their identity) may be disclosed if it is reasonably necessary for the purpose of the investigation concerning the subject matter of the Protected Disclosure. Youi will take all reasonable steps to reduce the risk that the Eligible Whistleblower will be identified as a result of that disclosure of information.

8.6 Youi is able to disclose the subject matter of the Protected Disclosure without the Eligible Whistleblower's consent as appropriate.

8.7 Any release of information in breach of this Policy will be regarded as a serious matter and may result in disciplinary action together with possible legal consequences (such as fines and, in extreme cases, imprisonment).

Protection (cont.)

Protection from legal action

8.8 Eligible Whistleblowers who have made a Protected Disclosure, are protected as follows:

- they are protected from any civil, criminal or administrative liability (including disciplinary action by Youi) for making the Protected Disclosure;
- no contractual or other remedy may be enforced, and no contractual or other right may be exercised against the Eligible Whistleblower on the basis of their Protected Disclosure;

and

- the information they have disclosed, including if the Protected Disclosure was made to ASIC, APRA or the Commissioner of Taxation, or was a Public Interest or Emergency Disclosure (see Annexure A), is not admissible in evidence against the Eligible Whistleblower in criminal proceedings (or proceedings for the imposition of a penalty other than proceedings in respect of the falsity of the information).

8.9 Eligible Whistleblowers will not have any immunity with respect to any wrongdoing they have engaged in which is related to their disclosure.

Protection from victimisation and detriment

8.10 Youi will take all reasonable steps to ensure Eligible Whistleblowers who make a Protected Disclosure are protected from detrimental conduct. Detrimental conduct might include, for example:

- dismissal of an employee;
- injury of an employee in his or her employment;
- alteration of an employee's position or duties to his or her disadvantage;
- discrimination between an employee and other employees of the same employer;
- harassment or intimidation of a person;
- harm or injury to a person, including psychological harm;
- damage to a person's property;
- damage to a person's reputation;
- damage to a person's business or financial position; or
- any other damage to a person.

8.11 Youi will not tolerate any form of detrimental conduct, which may result in disciplinary action being taken, up to and including termination of employment. There are also separate and serious legal consequences for causing detriment to an Eligible Whistleblower who has made a Protected Disclosure (such as fines and, in extreme cases, imprisonment).

Protection (cont.)

- 8.12** Youi will thoroughly investigate reports of any victimisation or detrimental conduct related in any way to a Protected Disclosure being made. An Eligible Whistleblower who is subjected to detrimental treatment (or a threat to cause detriment) should report this immediately to the Whistleblower Officer or the Alternative Whistleblower Officer so they can provide them with the necessary support.

Compensation and remedies

- 8.13** An Eligible Whistleblower who makes a Protected Disclosure may also be entitled to court ordered remedies, including:
- compensation for any loss or damage suffered;
 - injunctive relief restraining a person from engaging in detrimental conduct, or to prevent the effects of the detrimental conduct;
 - an order requiring an apology be given; or
 - any other order that the court thinks is appropriate.

Losing protection

- 8.14** Eligible Whistleblowers could lose their protections if:
- their conduct is revealed as a part of the wrongdoing. However, making a report may be taken into account as a mitigating factor in considering any disciplinary or other action;
 - they do not have reasonable grounds to believe that their wrongdoing report is true;
 - they knowingly give false or misleading information within a wrongdoing report. Knowingly giving false or misleading information may also constitute a breach of Policy, and could be subject to significant disciplinary action; or
 - they disclose information relating to wrongdoing or Reportable Conduct to someone not authorised to receive it (e.g. to the media without meeting required criteria for protection).

9. Support

- 9.1** If you have shared your identity, the Whistleblower Officer or the Alternative Whistleblower Officer can offer the following support:
- work with you to understand and manage any concerns you are experiencing, including managing stress or other welfare impacts, time or performance impacts, or other challenges resulting from the Disclosure or its investigation;
 - refer you to the Employee Assistance Program, which has been established to assist employees who wish to seek counselling to help resolve issues;
 - provide an open line of communication for you to report any act of detrimental conduct (i.e. harassment, intimidation or victimisation) for making the whistleblower report;

Support (cont.)

- assess the risk of detrimental conduct against you and take steps to mitigate that risk, for example where appropriate and in consultation with your manager, allowing you to perform your work duties from another location, reassigning you or other employees to another role or modifying the way in which you perform your work duties;
- address any detrimental conduct you may have suffered because you made a Protected Disclosure, for example, investigate the detrimental conduct, take disciplinary action, allow you to take extended leave as appropriate, develop a career management plan that involves new training and career opportunities or explore compensation and other remedies; and
- provide you with regular progress updates and the investigation outcome, as appropriate.

10. Escalation

10.1 You should immediately inform the Whistleblower Officer or Alternative Whistleblower Officer if you are concerned that:

- you may be, are being, or have been subjected to detrimental conduct; or
- your disclosure has not been dealt with in accordance with this Policy, including any assessment made by the Whistleblower Officer or Alternative Whistleblower Officer.

10.2 The Whistleblower Officer or Alternative Whistleblower Officer will consider the concerns you have raised and, if appropriate, may take such action as they consider appropriate.

11. Roles and responsibilities

Role	Responsibilities
Board and Directors	<ul style="list-style-type: none"> • Overall responsibility for this Policy, including its approval. • Eligible to receive Protected Disclosures but recommended to direct the Whistleblower to the Whistleblower Officer or Alternative Whistleblower Officer. • If receiving a disclosure, ensure the matter remains confidential.
Document Owner, meaning: The General Counsel	<ul style="list-style-type: none"> • Ensure the Policy is maintained, including that it is aligned with relevant legislation, regulations and Youi’s internal requirements, strategy and values. • Manage the process for updating the Policy in accordance with the review timing outlined in this Policy, including providing a clear summary of the changes to the document for the Board to approve. • Oversee reporting to the Internal Risk Committee, Board Audit Committee and Board, where appropriate. • Ensure the Policy is implemented and monitored, including that it is widely disseminated to and easily accessible by disclosers within and outside the organisation. • Ensure the Policy is reviewed to evaluate its continuing effectiveness and to ensure Youi has sufficient organisational competence to carry out its obligations under its authority provided by APRA or under its AFS licence.
Executive Leadership Team (including Head of Internal Audit and Head of Compliance), meaning: Person occupying a position on the Executive Leadership team of Youi	<ul style="list-style-type: none"> • Eligible to receive Protected Disclosures but recommended to direct the Whistleblower to the Whistleblower Officer or the Alternative Whistleblower Officer. • If receiving a disclosure, ensure the matter remains confidential. • Implementation and communication of this Policy.

Roles and responsibilities (cont.)

Role	Responsibilities
Whistleblower Officer	<ul style="list-style-type: none">• Receive Protected Disclosures.• If receiving a disclosure, ensure the matter remains confidential.• Work with you to understand and manage any risk of detrimental conduct being made against you.• Assessment of disclosure.• Investigation.• Protection.• Support.• Escalation.• Negotiation, selection and management of the supplier relationship with the external Speak Up Hotline vendor.• Selection and management of the supplier to provide the specialist training program for those involved in managing and investigating Protected Disclosures.• Oversee the Speak Up Program and the triage/assessment of Protected Disclosures.• Oversee the management of a secured central repository for recording Protected Disclosures.
Alternative Whistleblower Officer	<ul style="list-style-type: none">• Receive Protected Disclosures.• If receiving a disclosure, ensure the matter remains confidential.• Work with you to understand and manage any risk of detrimental conduct being made against you.• Assessment of disclosure.• Investigation.• Protection.• Support.• Escalation.

12. Related legislation and documents

- 12.1 This Policy aims to align with the following legislation/regulations/standards:
- Australia: Corporations Act 2001
 - Australia: Taxation Administration Act 1953

13. Approval and review

- 13.1 This Policy is approved by the Board.
- 13.2 The Policy is required to be reviewed biennially or whenever material changes occur.
- 13.3 Where minor amendments are required to this Policy, these changes can be approved by the Document Owner and noted by the Document Approver through standard business reporting. Minor amendments are amendments that relate to formatting, typographic errors, position/title/name changes or clarifications that do not alter the intent or possible interpretation of a policy statement.

14. Document control

14.1 Identification and approval

Document Name (Id)	Whistleblower Policy
Document Owner	Chief of Corporate Affairs and Governance
Document Approval	Board
Classification	A
Review Cycle	Biennial
Audience	Staff – all

14.2 Revision history

Version	Date created	Drafted by	Reviewed by	Comments
11.0	29/02/2024	Bianca Lau	Board	Approved

Document control (cont.)

14.3 Approval history

Approved by	Version tabled	Version approved	Date approved
Board Risk Committee	5.1	5.1	01/11/2018
Board Risk Committee	6.1	6.1	06/11/2019
Board	6.1	7.0	15/11/2019
Internal Risk Committee	7.2	7.2	27/04/2021
Board Audit Committee	7.2	7.2	13/05/2021
Board	7.2	8.0	14/07/2021
Internal Risk Committee	8.1	8.1	02/08/2022
Board Audit, Actuarial & Finance Committee	8.1	8.1	10/11/2022
Board	8.1	9.0	10/11/2022
Executive General Manager – Risk, Legal & Compliance	10.0	10.0	18/01/2023
Risk, Compliance & Assurance Committee	10.1	10.1	06/02/2024
Board Audit, Actuarial & Finance Committee	10.1	10.1	14/06/2024
Board	10.1	11.0	29/02/2024

Annexure A

How to raise concerns, including Reportable Conduct

Youi operates a Speak Up Program that is available for people to raise issues impacting their role, their wellbeing at work, or Youi, including Reportable Conduct.

Internal channels available

- **Reportable Conduct**

To raise and report issues of Reportable Conduct and for the protections under this Policy to apply, you must raise your complaint with an Eligible Recipient. To ensure that your report is received and investigated efficiently and effectively, we ask that you make your report to either the Whistleblower Officer or the Alternative Whistleblower Officer (who are both Eligible Recipients) or use the external Hotline.

- **Workplace grievances**

Grievances that relate to personal grievances, discrimination or harassment are not covered under this Policy and should be raised directly with your Manager, ExCo member, or People & Culture. Former Employees who do not have access to these resources can raise issues through the external Hotline and the report will be referred to People & Culture.

- **Customer complaints**

Matters that relate to customer complaints are not covered under this Policy and should be raised with an Advisor or the Internal Dispute Resolution Service team.

- **Risk and compliance incidents**

Risk and compliance issues are not covered under this Policy and can be raised via your Manager or reported as a Risk Incident. If you are worried you may suffer personal disadvantage or wish to use the protections under this Policy, please lodge your report directly to the Senior Manager - Regulatory Affairs and Speak Up, the General Counsel, Head of Compliance, Head of Internal Audit, your ExCo Member, a Member of the Board, or use the Speak Up Hotline.

External channels available

The external Speak Up and Whistleblower Hotline is a dedicated service managed by an external vendor, on behalf of Youi. Anonymous reporting is available through this reporting channel. The hotline can be contacted as follows:

- Speak Up Hotline (phone)
 - Australia – 1800 324 775

Annexure A (cont.)

External channels available (cont.)

- Speak Up Hotline (online)
 - Email: speakup@coreintegrity.com.au
 - Website: qrs.ly/YouiSpeakUp
 - Use the below QR code to access the Core Integrity Youi Portal



- Speak Up Hotline (post)
 - Youi Speak Up Hotline, PO Box 730, Milsons Point, NSW 1565

In Australia, any reports made to the external vendor will be referred to the Whistleblower Officer and, where appropriate, the Alternative Whistleblower Officer who will determine who is best placed to review and progress the report.

You may also report the Reportable Conduct externally to:

- AISC or APRA for a Protected Disclosure under the Corporations Act; or
- the Commissioner of Taxation for a Protected Disclosure under the Tax Act.

ASIC

Lodge a report via ASIC's online reporting form at:

<http://www.asic.gov.au/report-misconduct>

By post:

Australian Securities and Investments Commission

GPO Box 9827

Brisbane QLD 4001

APRA

By telephone: 1300 558 849

By email: whistleblower@apra.gov.au

The Commissioner

Lodge a report via the Tip-off form, available at:

<https://www.ato.gov.au/forms-and-instructions/tax-evasion-reporting-form>

Through the Tip-off form in the Help and Support section of the ATO app, downloadable from:

<https://www.ato.gov.au/online-services/online-services-for-individuals-and-sole-traders/ato-app#ato-DownloadtheATOapp>

By telephone: 1800 060 062